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To: [Benton Public Comment](#)
Subject: Testimony and Requests re: Coffin Butte Landfill, file # LU-24-027.
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Following are my comments, requests and testimony on the proposal to expand the Coffin Butte Landfill, file # LU-24-027.

First and foremost, the County should make a determination that the proposal by Republic Services should be reclassified as a new landfill proposal, not an expansion to the current landfill. It is a separate and distinct project, separated by a public road, requiring new leachate and other methane and waste management requirements and processes. A new landfill should require the State to become involved and the applicant should undertake a full environmental impact review to propose to the State for compliance with State and Federal laws and regulations.

Other comments include:

Groundwater contamination and leachate management are not adequately addressed in the Republic Services proposal. The County has a duty to ensure that the landfill and any expansion request meets state and federal pollution laws and regulations. All leachate from new (and current for that matter) the expansion proposal should be tested for contaminants to determine where it can be sent for treatment, or the potential requirement for the landfill operator to treat it on site. Currently leachate is sent to the City's waste treatment facility which is not able to treat for environmental contaminants. This is a violation of Benton County Comprehensive Plan policy 6.5.5 (Benton County shall strive for the safe storage, collection, reduction, reuse, recovery, and appropriate disposal of hazardous waste materials.) and BCC 53.215 (2) (undue burden on public facilities). The leachate is very highly likely to contain high concentrations of forever chemicals (PFAS), PCBs, lead, and many more highly toxic compounds that the City cannot properly treat before this effluent is dumped into the Willamette River. To comply with BC 6.5.5, the County needs to require lab testing of existing leachate to determine how the expansion request (and current operations) should manage leachate.

Eventually when landfill operations close, and after the temporary closure management by Republic Services ends, the County will need to manage leachate, methane, fire risk, and other long term, generational issues. The determination on the landfill expansion request should assess the County's long term financial costs and whether the County can manage a new landfill site. The County has a fiduciary responsibility to its citizens and future generations and should ensure adequate funding from Republic Services or other revenue streams, but failing to adequately plan for the long term pollution from the expansion (and the current facility) is also a violation of BC 6.5.5.

I frequently drive along Hwy 99W, Camp Adair Road, Independence Hwy and plastic litter in particular is continually flying out of in-coming and outgoing trucks (violation of BCC 55.215(1)). Current operations and any expansion should address frequent, at least weekly,

trash pick up. But it Benton County is windy, and cleanup would need to occur daily to keep plastic trash off of private property. A landowner compensation fund should be established as part of the expansion conditions (and the County should explore such a Fund for current operations when new operating agreements are negotiated).

I have spoken to employees at the landfill and they tell me that large amounts of organic fish and slaughterhouse waste are delivered to the landfill every week causing huge methane and odor issues. The County should insist on a comprehensive plan and solution to divert these waste streams from the currently approved landfill cells, and certainly as a condition to expansion and creation of a second landfill. The odor issues caused by large amounts of rotting animals and their waste is a violation of BCC 55.215(1).

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